

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STIPULATION TO EXTEND DEADLINE TO RESPOND TO  
SUBPOENAS ISSUED TO THE DETROIT INSTITUTE OF ARTS**

The Detroit Institute of Arts, a Michigan non-profit corporation, f/k/a, among other things, the Detroit Museum of Arts, Detroit Museum of Arts Founders' Society, and Founders Society Detroit Museum of Art ("**DIA Corp.**"), and the Issuing Parties<sup>1</sup> **STIPULATE** and **AGREE** as follows:

1. The Issuing Parties served subpoenas on the DIA Corp. on or about March 31, 2014 and April 11, 2014, seeking, among other things, documents related to the public art institute that is commonly known as the Detroit Institute of Arts.

2. As a result of several conferences, including conferences on April 14,

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<sup>1</sup> The Issuing Parties include Financial Guaranty Insurance Company, Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., and Erste Europäische Pfandbrief-und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., FMS Wertmanagement AoR, Dexia Credit Local & Dexia Holdings, Inc., the Official Committee of Retirees, Syncora Guarantee Inc. Syncora Capital Assurance Inc., and other parties on whose behalf counsel for the Issuing Parties may be acting.

2014 and April 21, 2014, the parties reached an agreement to narrow the scope of the documents to be produced subject to certain terms and reservations of rights (“**Agreement**”).

3. The DIA Corp. has taken substantial steps to collect and produce responsive documents consistent with the terms of the Agreement. Given the volume of documents and the difficulty associated with producing such documents, however, the DIA Corp. cannot fully comply with the May 6, 2014 deadline set forth in the Court’s *Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment* [Dkt. No. 4202] (“**Scheduling Order**”).

4. Based on the foregoing, the parties stipulate and agree to extend the deadline for the DIA Corp. to comply with the subpoenas to May 20, 2014. The deadline to object is also extended by agreement of the parties.

5. This stipulation is made in good faith and not for any dilatory purpose, and the parties will not be prejudiced by the granting of this stipulation.

HONIGMAN MILLER SCHWARTZ  
AND COHN LLP

By: /s/ Scott B. Kitei  
Arthur T. O'Reilly (P70406)  
Scott B. Kitei (P78064)  
Daniel N. Adams (P72328)  
2290 First National Building  
660 Woodward Avenue  
Detroit, MI 48226  
(313) 465-7000  
[aoreilly@honigman.com](mailto:aoreilly@honigman.com)

and

CRAVATH, SWAINE & MOORE LLP  
Richard Levin  
825 Eighth Avenue  
New York, NY 10019  
(212) 474-1000  
[rlevin@cravath.com](mailto:rlevin@cravath.com)

*Attorneys for The Detroit Institute of Arts*

/s/ Deborah L. Fish  
Deborah L. Fish (P38560)  
ALLARD & FISH, P.C.  
2600 Buhl Building  
535 Griswold  
Detroit, MI 48226  
Telephone: (313) 961-6141  
Facsimile: (313) 961-6142  
[dfish@allardfishpc.com](mailto:dfish@allardfishpc.com)

and

KRAMER LEVIN NAFTALIS &  
FRANKEL LLP  
Thomas Moers Mayer  
Jonathan M. Wagner  
1177 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 715-9100  
Facsimile: (212) 715-8000

*Counsel to Dexia Crédit Local &  
Dexia Holdings, Inc.*

/s/ Vincent J. Marriott, III  
Vincent J. Marriott, III, Esquire  
BALLARD SPAHR LLP  
1735 Market Street, 51st Floor  
Philadelphia, Pennsylvania 19103  
Tel: (215) 864-8236  
Fax: (215) 864-9762  
E-mail: [marriott@ballardspahr.com](mailto:marriott@ballardspahr.com)

Matthew G. Summers, Esquire  
BALLARD SPAHR LLP  
919 North Market Street, 11<sup>th</sup> Floor  
Wilmington, Delaware 19801  
Telephone: (302) 252-4428  
Facsimile: (302) 252-4466  
E-mail: [summersm@ballardspahr.com](mailto:summersm@ballardspahr.com)

-and-

Howard S. Sher, Esq. (P38337)  
JACOB & WEINGARTEN, P.C.  
Somerset Place  
2301 W. Big Beaver Road, Suite 777  
Troy, Michigan 48084  
Tel: (248) 649-1200  
Fax: (248) 649-2920  
E-mail:  
[howard@jacobweingarten.com](mailto:howard@jacobweingarten.com)

*Attorneys for Hypothekenbank Frankfurt  
AG, Hypothekenbank Frankfurt  
International S.A., Erste Europäische  
Pfandbrief- und Kommunalkreditbank  
Aktiengesellschaft in Luxemburg S.A.*

/s/ Alfredo R. Pérez  
Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1600  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: [alfredo.perez@weil.com](mailto:alfredo.perez@weil.com)

– and –

Ernest J. Essad Jr.  
Mark R. James  
WILLIAMS, WILLIAMS, RATTNER  
& PLUNKETT, P.C.  
280 North Old Woodward Avenue,  
Suite 300  
Birmingham, MI 48009  
Telephone: (248) 642-0333  
Facsimile: (248) 642-0856  
Email: [EJEssad@wwrplaw.com](mailto:EJEssad@wwrplaw.com)  
Email: [mrjames@wwrplaw.com](mailto:mrjames@wwrplaw.com)

*Attorneys for Financial Guaranty  
Insurance Company*

/s/ Rick L. Frimmer

Rick L. Frimmer  
J. Mark Fisher  
Michael W. Ott  
SCHIFF HARDIN, LLP  
233 W. Wacker Drive, Suite 6600  
Chicago, Illinois 60606  
Telephone: (313) 258-5600  
Facsimile: (312) 258-5600  
E-mail: [rfrimmer@schiffhardin.com](mailto:rfrimmer@schiffhardin.com)  
E-mail: [mfisher@schiffhardin.com](mailto:mfisher@schiffhardin.com)  
E-mail: [mott@schiffhardin.com](mailto:mott@schiffhardin.com)

*Attorneys for FMS Wertmanagement AöR*

/s/ Arthur H. Ruegger

Claude D. Montgomery (P29212)  
Carole Neville  
Arthur H. Ruegger  
DENTONS US LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 768-6700  
Fax: (212) 768-6800  
[claudemontgomery@dentons.com](mailto:claudemontgomery@dentons.com)  
[carole.neville@dentons.com](mailto:carole.neville@dentons.com)

Sam J. Alberts  
DENTONS US LLP  
1301 K. Street, NW  
Suite 600, East Tower  
Washington, DC 2005-3364  
Tel: (202) 408-6400  
Fax: (202) 408-6399  
[sam.alberts@dentons.com](mailto:sam.alberts@dentons.com)

Matthew E. Wilkins (P56697)  
Paula A. Hall (P61101)  
BROOKS WILKINS SHARKEY &  
TURCO PLLC  
401 South Old Woodward, Suite 400  
Birmingham, Michigan 48009  
Direct: (248) 971-1711  
Cell: (248) 882-8496  
Fax: (248) 971-1801  
[wilkins@bwst-law.com](mailto:wilkins@bwst-law.com)  
[hall@bwst-law.com](mailto:hall@bwst-law.com)

*Counsel for the Official Committee of  
Retirees*

/s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

*Attorneys for Syncora Guarantee Inc. and  
Syncora Capital Assurance Inc.*

**CERTIFICATE OF SERVICE**

I, Scott B. Kitei, hereby certify that the foregoing Stipulation to Extend Deadline to Respond to Subpoenas Issued to the Detroit Institute of Arts was filed and served via the Court's electronic case filing and noticing system on this 6th day of May 2014.

/s/ Scott B. Kitei

**UNITED STATES BANKRUPTCY COURT  
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In re:

CITY OF DETROIT, MICHIGAN,

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Case No. 13-53846

Hon. Steven W. Rhodes

**ORDER EXTENDING DEADLINE TO RESPOND TO  
SUBPOENAS ISSUED TO THE DETROIT INSTITUTE OF ARTS**

This matter having come before the Court on the Stipulation to Extend Deadline to Respond to Subpoenas Issued to The Detroit Institute of Arts (“**DIA Corp.**”), no further notice or hearing being required, and the Court being fully advised in the premises:

**IT IS HEREBY ORDERED** that, solely with respect to the DIA Corp., the deadline in the Court’s Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (“**Scheduling Order**”) to comply with or object to timely written discovery requests shall be extended until May 20, 2014. All other terms and conditions set forth in the Scheduling Order shall continue to govern except as otherwise altered by the Court.